

**EXHIBIT D**

**From:** [Julian Frachtman](#)  
**To:** [Jennifer Holt](#)  
**Cc:** [Law Offices of H Julian Frachtman](#); [Jameson Joyce](#)  
**Subject:** Re: Al-Sawai--re Box.com link to upload recordings/media files  
**Date:** Wednesday, February 19, 2025 11:05:49 PM  
**Attachments:** [image001.png](#)  
[Al-Sawai Supplement Responses to Disco.pdf](#)

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Good evening Ms. Holt,

Please accept the following supplemental discovery items. I apologize for their tardiness and volume, but the Plaintiff sprung these on us once the Judge issued his orders last week demanding clarification on certain items.

( Spoiler alert, never let anyone put anything important in off-site storage... )

**- in PDF: Plaintiff's Supplemental Responses to Discovery**

**- in google drive links:** Al-Sawai 001685 // 001686-001688 // 001689-1705 // and 001706 - 002029

( these drive links supply the balance of the documents Mr. Joyce requested regarding complaints / reports / Plaintiff's performance / the Trespass issued to Plaintiff / and Plaintiff's correspondence with UT administration )

**- Supplemental Audio is linked below:**

<https://recorder.google.com/d1fa9c57-776d-4bf5-85bf-345239fdf14b>

<https://recorder.google.com/135a480b-2eb8-42b4-8c28-fba2fa242d1c>

If you have difficulty opening or accessing any of these files, please let me know at your earliest convenience.

Thank you for your time and assistance in this matter.

Regards,

-hjf



Al-Sawai 1685.pdf



AL-SAWAI 1689 - 1705.pdf



Al-SAWAI - 1686-1688.pdf



SAWAI001706-002029-1.pdf

On Wed, Feb 19, 2025 at 8:01 AM Jennifer Holt <[Jennifer.Holt@oag.texas.gov](mailto:Jennifer.Holt@oag.texas.gov)> wrote:

OK, great — thanks!

Jennifer Holt

Senior Legal Assistant

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**From:** Law Offices of H Julian Frachtman <[info.hjfrachtmanlaw@gmail.com](mailto:info.hjfrachtmanlaw@gmail.com)>

**Sent:** Wednesday, February 19, 2025 7:50 AM

**To:** Jennifer Holt <[Jennifer.Holt@oag.texas.gov](mailto:Jennifer.Holt@oag.texas.gov)>

**Cc:** Julian Frachtman <[hfrachtmanlaw@gmail.com](mailto:hfrachtmanlaw@gmail.com)>; Jameson Joyce  
<[Jameson.Joyce@oag.texas.gov](mailto:Jameson.Joyce@oag.texas.gov)>

**Subject:** Re: Al-Sawai--re Box.com link to upload recordings/media files

The one sent this morning works - the other did not.

On Wed, Feb 19, 2025, 7:44 AM Jennifer Holt <[Jennifer.Holt@oag.texas.gov](mailto:Jennifer.Holt@oag.texas.gov)> wrote:

Our IT department just confirmed that you have to use the email that came from Box.com to accept the invitation before you can access the files.

"I see invites have been sent to [hfrachtmanlaw@gmail.com](mailto:hfrachtmanlaw@gmail.com) and [info.hjfrachtmanlaw@gmail.com](mailto:info.hjfrachtmanlaw@gmail.com)

Both invites show "Pending"

If the paralegal has access to one of those email addresses, they'll need to accept the invite before access will be granted."

Jennifer Holt

Senior Legal Assistant

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**From:** Law Offices of H Julian Frachtman <[info.hjfrachtmanlaw@gmail.com](mailto:info.hjfrachtmanlaw@gmail.com)>

**Sent:** Wednesday, February 19, 2025 7:34 AM

**To:** Jennifer Holt <[Jennifer.Holt@oag.texas.gov](mailto:Jennifer.Holt@oag.texas.gov)>  
**Cc:** Julian Frachtman <[hfrachtmanlaw@gmail.com](mailto:hfrachtmanlaw@gmail.com)>; Jameson Joyce  
<[Jameson.Joyce@oag.texas.gov](mailto:Jameson.Joyce@oag.texas.gov)>  
**Subject:** Re: Al-Sawai--re Box.com link to upload recordings/media files

Jennifer,

It was claiming a 404 access error when we clicked the invitation.

On Wed, Feb 19, 2025, 7:30 AM Jennifer Holt <[Jennifer.Holt@oag.texas.gov](mailto:Jennifer.Holt@oag.texas.gov)> wrote:

Good morning. I'm getting with our IT department because I'm not seeing why you can't access the folder.

I believe I've been able to successfully download your attachments and access the recordings online, but AAG Joyce may want to verify that he has access to all.

Thank you.

Jennifer Holt

Senior Legal Assistant

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**From:** Law Offices of H Julian Fractman <[info.hjfrachtmanlaw@gmail.com](mailto:info.hjfrachtmanlaw@gmail.com)>  
**Sent:** Tuesday, February 18, 2025 10:42 PM  
**To:** Jennifer Holt <[Jennifer.Holt@oag.texas.gov](mailto:Jennifer.Holt@oag.texas.gov)>  
**Cc:** Julian Frachtman <[hfrachtmanlaw@gmail.com](mailto:hfrachtmanlaw@gmail.com)>; Jameson Joyce  
<[Jameson.Joyce@oag.texas.gov](mailto:Jameson.Joyce@oag.texas.gov)>  
**Subject:** Re: Al-Sawai--re Box.com link to upload recordings/media files

Good evening Jennifer,

The box says I do not have access in the other link that you sent. I will start sending the items here so that you have them. Let me know if you have trouble accessing them. This email contains the document production. I will send a separate email with audios.

☐ [AL-SAWAI001468-001642.pdf](#)

☐ [AL-SAWAI001643-001645.pdf](#)

☐ [AL-SAWAI001646-001682.pdf](#)

☐ [AL-SAWAI001683-001684.pdf](#)

On Tue, Feb 18, 2025 at 11:56 AM Jennifer Holt <[Jennifer.Holt@oag.texas.gov](mailto:Jennifer.Holt@oag.texas.gov)> wrote:

Mr. Frachtman,

Regarding AAG Joyce's email below — you and [info.hjfrachtmanlaw@gmail.com](mailto:info.hjfrachtmanlaw@gmail.com) should have received an email from Box.com with a link to which to upload the recordings/media files.

Please let me know asap if you did not receive that email, or if you cannot access the folder below the below link.

<https://txoag.box.com/s/0y8g86pguijkvjhufbm9jjhdr1t6twvg>

Thank you.

Jennifer Holt

Senior Legal Assistant

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**From:** Jameson Joyce <[Jameson.Joyce@oag.texas.gov](mailto:Jameson.Joyce@oag.texas.gov)>

**Sent:** Tuesday, February 18, 2025 11:51 AM

**To:** Julian Frachtman <[hfrachtmanlaw@gmail.com](mailto:hfrachtmanlaw@gmail.com)>

**Cc:** [info.hjfrachtmanlaw@gmail.com](mailto:info.hjfrachtmanlaw@gmail.com); Jennifer Holt <[Jennifer.Holt@oag.texas.gov](mailto:Jennifer.Holt@oag.texas.gov)>

**Subject:** RE: Al-Sawai; Failure to Appear; Motion to Compel & Sanctions

Good morning Julian,

As you are aware, the noticed deposition of your client took place today at 10am, but neither you nor your client appeared. A Notice of Non-Appearance was prepared. If I do not receive full production as ordered by the Court by tomorrow, I will file a Motion for Sanctions. To avoid any issues with sending large media files (ie, MP3s), my legal assistant is sending you a Box link which you can use to upload the recordings.

Regards.

***Jameson C. Joyce***

Assistant Attorney General

Office of the Attorney General

General Litigation Division

209 W.14<sup>th</sup> Street, 6<sup>th</sup> Floor

Austin, Texas 78701

512.475.4088 (*t*)

512.979.5389 (*c*)

512.477.2348 (*f*)

Related image



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Regards,

Ashley Lemon

832-785-8292

Law Offices of H Julian Frachtman

Employment Law // Personal Injury // Commercial Litigation // Wills & Probate



*Qui audet adipiscitur*

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Thank you.

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**H. Julian Frachtman**

**Attorney & Counselor at Law**

**Certified Attorney *Ad Litem***

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tel: 832.499.0611 | fax: 713.651.0819



Employment Law // Personal Injury // Commercial Litigation // Wills & Probate

**Law Offices of H. Julian Frachtman**

*Qui audet adipiscitur*

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